

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-10106JLT

ZHANNA CHIZHIK, Administratrix)
of the Estate of Grigory Chizhik,)
Plaintiff)
)
v.)
)
SEA HUNT, INC.,)
TROPICLAND MARINE AND)
TACKLE, INC., and)
GREGORY ZILBERMAN,)
Defendants)

SUGGESTION OF BANKRUPTCY

Now comes the Defendant, Tropicland Marine and Tackle, Inc., and suggests to the Court that it is bankrupt. Defendant has filed for Chapter 7 protection in the United States Bankruptcy Court for the District of Massachusetts, Petition #05-11475 (Judge Robert Somma).

/s/ James T. Scamby

James T. Scamby (BBO #629144)
Richard E. Heifetz (BBO #229000)
Tucker, Heifetz & Saltzman, LLP
Three School Street
Boston, MA 02108
(617) 557-9696
Dated: May 20, 2005

CERTIFICATE OF SERVICE

I, James T. Scamby, hereby certify that I have this day served a copy of the foregoing document, by electronic mail, to the following counsel of record:

David B. Kaplan, Esquire
The Kaplan/Bond Group
88 Black Falcon Avenue, Suite 301
Boston, MA 02210
DKaplan@Kaplanbond.com

William P. Breen, Jr., Esquire
Murphy, Hesse, Toomey & Lehane, LLP
300 Crown Colony Drive, Suite 410
Quincy, MA 02269
wbreen@mhtl.com

/s/ James T. Scamby
James T. Scamby

Dated: May 20, 2005